

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 97-cr-98

RANDALL MILLER,

Defendant.

**SECOND UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE SUPPLEMENT**

On August 11, 2020, the Court granted the defendant's unopposed motion for extension of time to file a supplement to the defendant's pro se motion for compassionate release. Since that time, the defense has been working diligently to file a supplement, including reviewing over 1,200 pages of medical records and materials from Mr. Miller's underlying case, and preparing a motion on Mr. Miller's behalf. Recently, Mr. Miller has informed counsel that since we received his last updated medical records, he has had an additional appointment or two which are relevant to the medical conditions discussed by him in his motion.

Unfortunately, the probation department's contact person at the BOP for obtaining medical records is out of the office this week, and we have been unable to obtain copies of the updated records. The probation department advises that the individual should be back in the office next week, and we will hopefully have the updated records by then.

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of Wisconsin, Inc.*

For these reasons, the defense respectfully asks the Court for a two-week extension to the previously imposed filing deadlines in this case as follows:

Defense Supplement Due: September 18, 2020

Government Response Due: October 2, 2020

Defense Reply Due: October 9, 2020

Undersigned counsel has spoken with AUSA Carol Kraft who has indicated the government does not oppose this extension.

Dated at Milwaukee, Wisconsin, this 2nd day of September, 2020.

Respectfully submitted,

/s/ Joshua D. Uller

Joshua D. Uller, WI Bar #1055173

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